

United States District Court
Southern District of Texas
Corpus Christi Division

United States Courts
Southern District of Texas
FILED

APR 21 2021

Nathan Ochsner, Clerk of Court

Bobbie Lee Haverkamp
Plaintiff

vs.

Civil Action 2:17-CV-18

Joseph Penn, et al
Defendant

Advisory to Court on Potential
Monetary Liability to Defendants
in the above civil action.

To the Honorable Court of Said Court,

Now Comes, Ms Bobbie

AKA the Plaintiff and has need to brief this
Court that the above Defendants have created
a situation where physical harm can occur
to Courts party to intervene AKA Shawn
Kelly Vinson.

Argument

1 Your Honor, Vinson now known as "Selene"
for the purpose of this Advisory.

- 2 also D.E 186 the Motion to Intervene was denied yet came with a Court order for reasons for the denial.
- 3 On 4/6, the Court presumed there is a presumption that the Plaintiff can adequately represent their overall interest, hence the Advisory to this Court.
- 4 The Court is well aware that in a 5th Circuit case Gibson/Koslet supra that Koslet was living largely as a woman, long hair, make-up, clothes.
- 5 The Court is well aware the 5th Circuit ruled non-invasive treatments for Gender Dysphoria were well within good medical practices — these being Hormones, Electrolysis, female clothing and accessories, mental health services, long hair to shoulder length.
- 6 Due to the presumption of representation by the Plaintiff the burden to advise the Court falls squarely on the Plaintiff's shoulders.
- 7 Selene was served a case for refusal to comply with grooming standards of a heterosexual male. Exhibit 2

8 The Intervention Defendants in DE 186 and Safe Prison Sgt Rogers and her supervisor will be held responsible for any self harm by Selene.

9 The issue of her hair has surfaced to the point she becomes so stressed she cuts her penis and testicals.

There is not a bit of mental help, the intervention Defendants (thru Dr. Joseph Penn has the Power) to write a 6 month long hair pass to Selene till the Plaintiff can resolve this matter.

10 And the Formation of Issues, the Plaintiff is inserting the argument for Long Hair Pass that is also in the Civil Actions relief. ①

11 Your Honor, the Plaintiff certainly won't tell a Warden how to run his prison but on the other hand the Plaintiff will not sit by and let a Policy for Heterosexual Males be applied to Selene where she self harms her self.

12 Taking this to a Jury is where the present Civil Action is going, the Plaintiff would have a difficult time why she did not defend Selene.

see Exh. b. 4

13 "Selene" falls under Policy 51.11 with attachments dated 5/16/2012, the Court is well aware the present Civil Action is running up Defendants.

14 The Court is also aware that the Plaintiff is dropping Dr. Lawrence Luthicum MD and Director of Medical Health for TDCJ.

15 Your Honor, very few people know of the Official Step 2 Grievance where the Office of Professional Standards said the specialist will follow Policy C-51.11 with attachments to treat this condition.

16 This command puts responsibility on Corbello's defendants, right now the Plaintiff has a hedge around the issue of Transgender health with non-invasive treatments and sex-reassignment surgery where no one can come in until this matter is settled.

17 The problem is "Selene" is [IN] the hedges circle [WE] all are aware of her disability in Gender Dysphoria that if pushed she will harm herself.

18 The Stiles Unit has 3 Building A+C pods for Safe-Keeping and Transgender.

19 Everyone knows the issue for Transgender Health is in a flux, we have people running around the unit in General Population with Long Hair, Exhibit 1 explains it to the Court

20 The Plaintiff has went in front of Stiles Unit Safe Keeping Boards with Sgt Rogers, Sgt for Safe-Keeping and is well aware of this present Civil Action as well as Warden Williams.

21 Selene is supposed to be able to grow her hair above shoulder length. Yes, Your Honor, its a good old boy agreement but it satisfied Selene to where she's left the razor blade alone and we are not life fighting her to Galveston.

22 Summary

- 1). Exhibit 1 inclosed
- 2). Corbello's Defendants are well aware of they failed to give Selene a long hair pass.
- 3). Safe Prisons is aware of the mental Disorder and fails to require to Galveston Dr. Penn Director of Mental Health.
- 4) Your Honor, all of these points to deliberate indifference under the Ramos-V-Lamb standard²

Ⓡ 101 S.Ct 1759

5. Corbello has caused confusion, Any self-harm by Selene will prompt Civil Action with monetary damages for her entrest.

Here's the options.

- 1) Back off the long hair issue, we can good old boy till we get Transgender Health settled
- 2) Issue long hair passes for 6 months to Selene, as a special medical pass for mental stress.
- 3) The Plaintiff will defer any passes to her till the issue is Court settled, other transgenders have to defer also due to the author of the Civil Action deferred.

23 Your Honor no action is required of the Court at this time. The Plaintiff strongly suggest the Intervention Defendants and Safe Prison take action, there will be no further harm to Selene due to their indifference under the Ramos/Lamb standard supra

So Prays the Plaintiff

Ms Bobbie

4-9-2021

Certification of Service

24. The Plaintiff swears under the penalty of perjury this was dropped in the Stiles Prison mailbox April 9, 2021 for delivery to

Texas Attorney General - Corbello
D.O. 12548
Austin, Texas 78711-2548

by the Clerk of the Court due to the Plaintiff has no way to reproduce the Document

The Clerk is also directed to mail a copy to

25. State - Prison Ms Roger, Sgt
Stiles Unit
3060 FM 3514
Beaumont, Texas 77705

So Pays the Plaintiff
Ms Bobbie
4-9-2021

Right Behind Bars
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